

Exhibit 21

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
Plaintiff,)
vs.) Case No.
) 17-cv-00939-WHA
UBER TECHNOLOGIES, INC.;)
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
)
Defendants.)
)
)
)
_____)

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VIDEOTAPED DEPOSITION OF
OGNEN STOJANOVSKI, ESQ.
San Francisco, California
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Volume I

Reported by:
MARY J. GOFF
CSR No. 13427
Job No. 2663397
PAGES 1-321

1 were really discussed at high-level things. Like, 05:35:00
2 do they really want our -- the Owl sensor in the 05:35:03
3 team or is it -- the primary focus is on the team. 05:35:07
4 Those high-level things. 05:35:10

5 But there's any number of ways to 05:35:12
6 structure a transaction once you decide you're going 05:35:16
7 forward and this is how much you're paying for it. 05:35:18

8 Q (BY MR. JUDAH) Had you ever talked numbers 05:35:21
9 with Trimble or any of the other potential 05:35:22
10 acquirers? 05:35:24

11 A Yes. 05:35:25

12 Q And what -- what kind of numbers had 05:35:25
13 been -- had been communicated either, you know, 05:35:27
14 by -- by Tyto to -- to the Trimble or potential 05:35:31
15 acquirer, whoever it would be, or vice versa? 05:35:34

16 A We generally made our first asking -- I 05:35:38
17 mean, again, it changed over time, right, whether it 05:35:46
18 was lower, sort of our opening ask. So if you were 05:35:50
19 interested, Are you willing to pay around 05:35:55
20 \$20 million for it, was the opening ask usually. 05:35:57

21 Q The ultimate asset purchase by Ottomotto 05:36:01
22 was for approximately \$8 million, correct? 05:36:05

23 A Correct. 05:36:08

24 Q And so -- so how did that -- how did the 05:36:09
25 process of -- of the acquisition -- of the asset 05:36:14

1 purchase by Ottomotto begin? Did -- did someone 05:36:16
2 from Tyto LiDAR reach out to Ottomotto or did 05:36:20
3 someone from Ottomotto -- someone from Ottomotto 05:36:23
4 reach out to Tyto? 05:36:25
5 A Ottomotto reached out to Tyto. 05:36:26
6 Q And who from Ottomotto reached out to 05:36:28
7 Tyto? 05:36:31
8 A Well, Anthony reached out to me. 05:36:33
9 Q When was that? 05:36:36
10 A I would say February -- maybe late 05:36:40
11 February of 2016. February or March. Thereabouts. 05:36:44
12 Early 2016. 05:36:48
13 Q And that deal essentially -- when did that 05:36:51
14 deal get signed? 05:36:57
15 A I think it was signed -- signed early May 05:37:00
16 or maybe late April. The ask -- I think it closed 05:37:03
17 May 6, but don't hold me to it. It -- that's to the 05:37:12
18 best of my recollection. 05:37:20
19 Q So the whole deal went down relatively 05:37:20
20 quickly from the time -- I mean, if -- if the first 05:37:23
21 time that Anthony Levandowski reached out to you 05:37:25
22 about potentially acquiring Tyto was in -- was in 05:37:28
23 February or March, and the deal closed in May, then 05:37:33
24 it -- it closed in -- basically the whole process 05:37:38
25 took approximately two or three months? 05:37:41

1 those e-mail accounts. 06:42:49

2 Q Was it before or after, you know, 06:42:50

3 January 1 of 2017? 06:42:53

4 A It was before January 1, 2017. 06:42:57

5 Q But why did you close down those e-mail 06:42:59

6 domain names at -- let me ask you that again. 06:43:03

7 Why did you close down those e-mail 06:43:04

8 accounts and e-mail archives? 06:43:07

9 A Because at the end of day we did wind up 06:43:09

10 selling the Owl sensor itself too. And Tyto was -- 06:43:11

11 no longer was an ongoing concern with real business 06:43:19

12 opportunities, but rather, just had to have some 06:43:21

13 cash in the bank account. 06:43:25

14 So -- so I wound up -- I wound down all 06:43:27

15 other accounts. And once I was done winding down 06:43:30

16 all other accounts, I didn't need to have Tyto 06:43:33

17 LiDAR's anymore. That -- it didn't make sense in 06:43:35

18 paying for ongoing an e-mail host. 06:43:37

19 THE COURT REPORTER: I'm sorry. I didn't 06:43:40

20 need to have Tyto LiDAR? 06:43:41

21 A Sorry. Can you say it again? 06:43:41

22 (The Reporter read the record as follows: 06:43:47

23 And once I was done winding down all other accounts, 06:43:47

24 I didn't need to have Tyto LiDAR?) 06:43:47

25 A I didn't need to have access to Tyto LiDAR 06:43:48

1 e-mail anymore, so there wasn't any sense in paying 06:43:50
2 for ongoing e-mail hosting services. 06:43:54
3 Q (BY MR. JUDAH) Are those e-mail accounts 06:43:58
4 and e-mail archives recoverable? 06:44:00
5 A I don't know. 06:44:03
6 Q What -- who -- who was the host of those 06:44:04
7 e-mail accounts and e-mail archives? 06:44:07
8 A Google. 06:44:11
9 Q Google what? 06:44:14
10 A Well, I don't -- whatever it is. G-mail 06:44:17
11 hosting for business -- I'm not sure of the exact -- 06:44:19
12 you know, companies that -- like G-mail Professional 06:44:24
13 Services from Google. 06:44:27
14 Q Is it your understanding that all of those 06:44:29
15 e-mails have been permanently destroyed? 06:44:31
16 A I don't know if they have been permanently 06:44:36
17 destroyed or not. 06:44:38
18 Q Do you have any documents that -- that 06:44:42
19 provide -- well, let me ask you this: If you wanted 06:44:44
20 to try to recover those e-mails, what would you do? 06:44:45
21 MR. SAWYER: Objection, form. 06:44:50
22 MS. RAY: Join. 06:44:50
23 A I'm not sure how I would go about it. I 06:44:51
24 don't know. I would try to contact Google, I guess. 06:44:53
25 Q (BY MR. JUDAH) Did you ever discuss having 06:44:57